

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
JONESBORO DIVISION

OLD ST. PAUL MISSIONARY  
BAPTIST CHURCH

PLAINTIFF

V.

NO. 3:07-cv-00043 WRW

FIRST NATION INSURANCE GROUP;  
AA RISK MANAGEMENT, INC.;  
AA COMMUNICATIONS, INC.;  
GWEN MOYO; CRAIG GREENE;  
JOHN DOES 1-10;  
DOE COMPANIES 1-10

DEFENDANTS

**JOINT MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

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Counsel for the Defendants, Less, Getz & Lipman, PLC (“LGL”) and Hardin & Grace, P.A. (“H&G”), pursuant to Local Rule 83.5(f), hereby move for an order allowing each, and each of its members, to withdraw as counsel of record for the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene. In support of this joint motion, LGL and H&G state that irreconcilable differences have arisen between counsel and their clients and unresolvable conflicts of interest may have arisen between the clients themselves, which makes it impossible for counsel to continue in any capacity.

Pursuant to Local Rule 83.5(f), proper notice is being given to the clients and opposing counsel by way of a Notice filed contemporaneously with this Motion and which is attached hereto as Exhibit “A” and incorporated herein by reference. To date, there has been no contact with the clients regarding the names of any substitute counsel, and as such, the Defendants may be contacted at the following addresses:

Gwen Moyo  
8000 GSRI Avenue  
Building 3000, Room 128  
Baton Rouge, LA 70820

AA Communications, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

AA Risk Management, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

Craig Greene c/o Thomas Shahady  
Adorno & Yoss LLP  
350 East Las Olas Blvd., Suite 1700  
Ft. Lauderdale, FL 33301

First Nation Insurance Group  
4544 Sheppard Avenue East, Suite 130  
Toronto, Ontario M1S 1V2, Canada

WHEREFORE, Less, Getz & Lipman, PLC and Hardin & Grace, P.A., respectfully request that the motion be granted and they be allowed to withdraw as counsel for the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene.

Respectfully,

HARDIN & GRACE, P.A.  
Attorneys for Defendants  
500 Main Street, Suite A  
P.O. Box 5851  
North Little Rock, AR 72119-5851  
Telephone: (501) 378-7900  
Facsimile: (501) 376-6337

By: /s/David A. Grace  
David A. Grace  
State Bar No. 76-044

LESS, GETZ & LIPMAN  
Attorney for Defendants  
100 Peabody Place, Suite 1150  
Memphis, Tennessee 38103  
Telephone: (901) 525-8700  
Facsimile: (901) 525-3569

By: /s/Justin R. Giles, III  
Justin R. Giles, III  
TN Bar No. 24123

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to:

Mr. Lawrence W. Jackson  
RIEVES, RUBENS & MAYTON  
P.O. Box 1359  
West Memphis, AR 72303

I hereby certify that a copy of the foregoing was served on the non-ECF participants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, via U.S. Mail, Certified Mail, Return Receipt Requested, postage prepaid, this 15<sup>th</sup> day of May, 2007, to the following addresses:

Gwen Moyo  
8000 GSRI Avenue  
Building 3000, Room128  
Baton Rouge, LA 70820

AA Communications, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

AA Risk Management, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

Craig Greene c/o Thomas Shahady  
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350 East Las Olas Blvd., Suite 1700  
Ft. Lauderdale, FL 33301

First Nation Insurance Group  
4544 Sheppard Avenue East, Suite 130  
Toronto, Ontario M1S 1V2, Canada

/s/Justin R. Giles, III  
JUSTIN R. GILES, III

**EXHIBIT "A"**

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JOHN DOES 1-10;  
DOE COMPANIES 1-10

DEFENDANTS

**NOTICE OF REQUEST TO WITHDRAW AS COUNSEL  
FOR DEFENDANTS**

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Counsel for the Defendants, Less, Getz & Lipman, PLC ("LGL") and Hardin & Grace, P.A. ("H&G"), pursuant to Local Rule 83.5(f), hereby give notice to the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, and opposing counsel, Lawrence W. Jackson, that irreconcilable differences have arisen between counsel and their clients and unresolvable conflicts of interest may have arisen between the clients themselves, forcing them to withdraw as counsel of record, and they have, therefore, sought to withdraw as counsel by way of motion, which was filed on the 15<sup>th</sup> day of May, 2007, a copy of which is attached hereto as Exhibit "A" and incorporated herein by reference.

Each of the Defendants is urged in the strongest terms to take immediate steps to secure new counsel to protect their separate interests herein. Plaintiff's Motion to Strike Defendants' Answer

and Notice of Removal, Objection to Removal and Motion to Remand filed herein on May 9, 2007 and Plaintiff's Motion to Strike Defendants' Answer filed on or about May 9, 2007 in the Circuit Court of Crittenden County, Arkansas, each of which are being mailed to each defendant with this Notice, require each Defendant's immediate attention and action.

Respectfully,

HARDIN & GRACE, P.A.  
Attorneys for Defendants  
500 Main Street, Suite A  
P.O. Box 5851  
North Little Rock, AR 72119-5851  
Telephone: (501) 378-7900  
Facsimile: (501) 376-6337

By: /s/David A. Grace  
David A. Grace  
State Bar No. 76-044

AND

LESS, GETZ & LIPMAN  
Attorney for Defendants  
100 Peabody Place, Suite 1150  
Memphis, Tennessee 38103  
Telephone: (901) 525-8700  
Facsimile: (901) 525-3569

By: /s/Justin R. Giles, III  
Justin R. Giles, III  
TN Bar No. 24123

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to:

Mr. Lawrence W. Jackson  
RIEVES, RUBENS & MAYTON  
P.O. Box 1359  
West Memphis, AR 72303

I hereby certify that a copy of the foregoing, a copy Plaintiff's Motion to Strike Defendants' Answer and Notice of Removal, Objection to Removal and Motion to Remand and a copy of Plaintiff's Motion to Strike Defendants' Answer filed in the Circuit Court of Crittenden County, Arkansas, were served on the non-ECF participants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, via U.S. Mail, Certified Mail, Return Receipt Requested, postage prepaid, this 15<sup>th</sup> day of May, 2007, to the following addresses:

Gwen Moyo  
8000 GSRI Avenue  
Building 3000, Room128  
Baton Rouge, LA 70820

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/s/Justin R. Giles, III  
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JUSTIN R. GILES, III